



JOHN ENGLER, Governor

**DEPARTMENT OF ENVIRONMENTAL QUALITY**

*"Better Service for a Better Environment"*

HOLLISTER BUILDING, PO BOX 30473, LANSING MI 48909-7973

INTERNET: [www.deq.state.mi.us](http://www.deq.state.mi.us)

**RUSSELL J. HARDING**, Director

REPLY TO:

AIR QUALITY DIVISION  
PO BOX 30260  
LANSING MI 48909-7760

April 16, 2001

Dear Facility Owner/Operator:

Subject: Oil and Natural Gas Production Facilities and Natural Gas  
Transmission and Storage Facilities NESHAP;  
Facility Notification Letter

Pursuant to Section 112 of the Clean Air Act (Act), as amended, the Administrator of the United States Environmental Protection Agency promulgated two National Emission Standards for Hazardous Air Pollutants (NESHAP) that may affect your business. The NESHAP From Oil and Natural Gas Production Facilities (40 CFR Part 63, Subpart HH) and the NESHAP From Natural Gas Transmission and Storage Facilities (40 CFR Part 63, Subpart HHH) were promulgated on June 17, 1999. The Administrator has determined that oil and natural gas production facilities and natural gas transmission and storage facilities emit hazardous chemicals that are among the 188 listed for regulation under Section 112 of the Act.

These standards apply to any "facility" classified as a "major source" of hazardous air pollutants (HAPs), and engaged in the production of oil and natural gas or the transmission and storage of natural gas. A major source for HAPs is defined as *"a facility that has the potential to emit 10 tons per year or more of any single HAP, or has the potential to emit 25 tons per year or more of any combination of HAPs."* Based on existing records, we believe that you may have facilities in Michigan affected by these standards. Therefore, this mailing is to provide you with notice and requirements of the standards, and to request submittal of the required initial notification reports. Included with this letter is the following information:

1. Initial Notification Report Forms;
2. A list of Volatile Hazardous Air Pollutants (VHAPs);
3. A definition of the term "facility;" and
4. A listing (although it may be incomplete) of your Michigan facilities.

The purpose of the initial notification reports is to notify the Michigan Department of Environmental Quality whether or not the Oil and Natural Gas Production Facilities or Natural Gas Transmission and Storage Facilities NESHAPs apply to your facilities. You are reminded that:

- All facilities that **are subject** to the NESHAP must submit an initial notification report that was due June 17, 2000. Failure to do so is a violation of the federal Clean Air Act.
- Facilities that **are not subject** to the NESHAP do not have to return an initial notification report. However, doing so will get your records updated thereby removing your name from future mailings.

It should be noted that:

- An initial notification report for an existing facility is due no later than 30 days after receipt of this letter. An existing facility is one that was constructed or reconstructed on or before February 6, 1998.
- An initial notification report for a new facility is due within 120 days after startup. A new facility is one where construction or reconstruction commenced after February 6, 1998.

Please complete the enclosed reports and submit them to the appropriate Air Quality Division district office as listed in Attachment A of the forms.

Existing facilities that are subject to either the Oil and Natural Gas Production Facilities or Natural Gas Transmission and Storage Facilities NESHAP are required to be in compliance with the provisions of the NESHAP by June 17, 2002. Existing facilities that are a sources with an increase in the potential to emit of HAPs above the major source thresholds are required to comply with the provisions of the NESHAP no later than 3 years after becoming a major source. An area source is defined as *"a facility with a potential to emit less than 10 tons per year of any single HAP and less than 25 tons per year of any combination of HAPs."*

New facilities that are subject to either the Oil and Natural Gas Production Facilities or Natural Gas Transmission and Storage Facilities NESHAP were required to be in compliance with the provisions of the NESHAP by June 17, 2000. New facilities that are area sources that increase their potential to emit HAPs above the major source thresholds from equipment covered by the standard must comply with the provisions of this NESHAP immediately upon becoming a major source.

If you have any questions, please contact Ms. Teresa Walker, Air Quality Division, at 616 356-0240, your appropriate Air Quality Division District Office (see Attachment A), or Mr. Dale Copedge, Environmental Assistance Division, at 517 335-0383. The two regulations cited in this letter, Subpart HH and Subpart HHH, can be found on the Environmental Protection Agency's Web sites [www.epa.gov/ttn/uatw/oilgas/oilgaspg.html](http://www.epa.gov/ttn/uatw/oilgas/oilgaspg.html) and [www.epa.gov/ttn/uatw/natgas/natgaspg.html](http://www.epa.gov/ttn/uatw/natgas/natgaspg.html), respectively.

Thank you for your cooperation in this matter.

Sincerely,

Gerald Avery  
Field Operations Supervisor  
Air Quality Division  
517-373-7037

Enclosures

cc: Mr. Dale Copedge, EAD, DEQ  
Ms. Teresa Walker, AQD, DEQ  
All AQD Field Supervisors